

1 UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF OHIO
3 EASTERN DIVISION

4 IN RE: NATIONAL)
5 PRESCRIPTION) MDL No. 2804
6 OPIATE LITIGATION)
7 Case No.
8 1:17-MD-2804
9 THIS DOCUMENT RELATES) Hon. Dan A.
10 TO: Case Track 8) Polster

11 TUESDAY, NOVEMBER 15, 2022

12 HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER
13 CONFIDENTIALITY REVIEW

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15 Remote videotaped deposition of
16 Jillanne Smith, held at the location of the
17 witness in Lakeland, Florida, commencing at
18 10:19 a.m. Eastern Time, on the above date,
19 before Carrie A. Campbell, Registered
20 Diplomat Reporter, Certified Realtime
21 Reporter, Illinois, California & Texas
22 Certified Shorthand Reporter, Missouri,
23 Kansas, Louisiana & New Jersey Certified
24 Court Reporter.

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1 pharmacy compliance.

2 QUESTIONS BY MS. FITZPATRICK:

3 Q. It was a new job, right?

4 A. Yeah.

5 When you say that was a new
6 focus, can you clarify what you mean?

7 Q. Well, previously Publix didn't
8 have anyone focused on controlled substance
9 reporting and compliance and the
10 centralization of that, did they? That's why
11 it was a new position. It didn't exist
12 before you.

13 A. This was -- I think it's
14 important to clarify that this focus was on
15 centralizing. We had functions in place for
16 sure. They were decentralized. So this was
17 centralizing them. That's what I wanted to
18 clarify.

19 Q. Thank you.

20 And we're going to look at what
21 happened when those functions weren't
22 centralized and why Publix all of the sudden
23 in 2018 realized it really needed to get
24 those functions centralized. Okay? We're
25 going to take a look at that.

1 to be filled, right? It didn't flag that?

2 A. The system didn't -- the
3 enterprise system didn't validate the DEA
4 numbers. It validated, I think, the size of
5 the characters in the field.

6 But our -- we had a program
7 with RelayHealth that when the claims went
8 through, it would check for DEA validity as
9 well as scheduling authority. So we would
10 get that back before the claim was filled and
11 dispensed and paid for.

12 Q. But, ma'am, that's not -- by
13 "validate" you mean -- you're talking about
14 check. There were prescriptions -- you
15 recall there were prescriptions that went out
16 the door, that got dispensed, to individuals
17 using invalid DEA -- dummy DEA numbers.

18 MR. LARSON: Object to form.

19 QUESTIONS BY MS. FITZPATRICK:

20 Q. Correct?

21 MR. LARSON: Go ahead,
22 Jillanne.

23 THE WITNESS: I don't recall
24 specific prescriptions getting
25 dispensed with invalid, but what I do

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CERTIFICATE

I, CARRIE A. CAMPBELL, Registered
Diplomate Reporter, Certified Realtime
Reporter and Certified Shorthand Reporter, do
hereby certify that prior to the commencement
of the examination, Jillanne Smith, was duly
sworn by me to testify to the truth, the
whole truth and nothing but the truth.

I DO FURTHER CERTIFY that the
foregoing is a verbatim transcript of the
testimony as taken stenographically by and
before me at the time, place and on the date
hereinbefore set forth, to the best of my
ability.

I DO FURTHER CERTIFY that I am
neither a relative nor employee nor attorney
nor counsel of any of the parties to this
action, and that I am neither a relative nor
employee of such attorney or counsel, and
that I am not financially interested in the
action.

Carrie A. Campbell

CARRIE A. CAMPBELL,
NCRA Registered Diplomate Reporter
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